

1 Katherine M. Dugdale, Bar No. 168014
KDugdale@perkinscoie.com
2 PERKINS COIE LLP
1888 Century Park E., Suite 1700
3 Los Angeles, CA 90067-1721
Telephone: 310.788.9900
4 Facsimile: 310.788.3399

5 Holly M. Simpkins, *pro hac vice*
HSimpkins@perkinscoie.com
6 Lauren Watts Staniar, *pro hac vice*
LStaniar@perkinscoie.com
7 PERKINS COIE LLP
1201 Third Avenue, Suite 4900
8 Seattle, WA 98101-3099
Telephone: 206.359.8000
9 Facsimile: 206.359.9000

10 Attorneys for Plaintiff
Twitch Interactive, Inc.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 TWITCH INTERACTIVE, INC., a
Delaware corporation,

17 Plaintiff,

18 v.

19 JOHN AND JANE DOES 1–100,
20 individuals,

21 Defendant.

Case No. 19-cv-03418-WHO

**DECLARATION OF HOLLY M.
SIMPKINS IN SUPPORT OF PLAINTIFF
TWITCH INTERACTIVE, INC.'S *EX*
PARTE APPLICATION FOR LEAVE TO
SERVE ADDITIONAL THIRD-PARTY
SUBPOENAS PRIOR TO A RULE 26(f)
CONFERENCE**

[Civil L.R. 7-10]

I, Holly M. Simpkins, declare as follows:

1. I am an attorney licensed to practice law before the courts of the State of Washington and am admitted *pro hac vice* in this matter. I am a Partner at Perkins Coie LLP, and counsel in this action for Plaintiff Twitch Interactive, Inc. (“Twitch”). I submit this declaration in support of Twitch’s *Ex Parte* Application for Leave to Serve Additional Third-Party Subpoenas Prior to a Rule 26(f) Conference. I have personal knowledge of the facts stated herein and, if called upon, could and would testify competently thereto under oath.

2. Shortly after the Court granted Twitch’s First *Ex Parte* Application for Leave to Serve Third Party Subpoenas Prior to a Rule 26(f) Conference, Twitch served subpoenas on the eleven third parties named in the order. Twitch has received a response to each subpoena.

3. Attached hereto as Exhibit A is a screenshot of the website www.artifactstreams.com, and screenshots from Discord server number 585980929831600138 (called at times PEEPO PLANET) that defendants used to discuss and plan their attack. The website located at www.artifactstreams.com had links to the Discord server.

4. Attached hereto as Exhibit B is a copy of the information returned from the WhoIs search for www.artifactstreams.com.

5. Twitch received hundreds of rows of data showing twenty-two unique IP addresses used by Discord user Skel#1175. Using a reverse WhoIs lookup tool, the ISP and geolocation associated with each IP address were identified. All the IP addresses associated with Skel #1175 were geolocated in northern New Jersey and surrounding areas. Eighteen of the IP addresses are associated with Kean University and T-Mobile USA Inc.

IP Address	ISP
131.125.11.1	Kean University
172.56.28.234	T-Mobile USA Inc.
172.56.36.131	T-Mobile USA Inc.

172.56.36.200	T-Mobile USA Inc.
172.56.36.207	T-Mobile USA Inc.
172.56.37.16	T-Mobile USA Inc.
172.56.37.160	T-Mobile USA Inc.
172.56.37.236	T-Mobile USA Inc.
172.56.37.91	T-Mobile USA Inc.
172.58.201.24	T-Mobile USA Inc.
172.58.232.164	T-Mobile USA Inc.
172.58.232.170	T-Mobile USA Inc.
172.58.233.136	T-Mobile USA Inc.
172.58.233.4	T-Mobile USA Inc.
172.58.233.93	T-Mobile USA Inc.
208.54.87.166	T-Mobile USA Inc.
208.54.87.187	T-Mobile USA Inc.
208.54.87.252	T-Mobile USA Inc.

6. In Google's subpoena response, the IP address 73.26.187.185 was provided as associated with the ganggangchef@gmail.com account. At my direction, this IP address was cross-referenced with the IP addresses associated with the Discord servers from Twitch's subpoena to Discord. The 73.26.187.185 IP address was also used by Discord users WideHardo#6615, Lianno#751, TriHard#1484, and Elundis#8261, who were identified as the creators and/or owners of the Discord servers on which the attacks were coordinated.

7. Using a reverse WhoIs lookup tool, it was learned that seventeen IP addresses associated with WideHardo#6615, Lianno#751, TriHard#1484, and Elundis#8261 were geolocated in the United States and associated with T-Mobile USA Inc. and Comcast Cable Communications LLC.

IP Address	ISP
172.58.56.214	T-Mobile USA Inc.

172.58.56.235	T-Mobile USA Inc.
172.58.59.132	T-Mobile USA Inc.
172.58.59.138	T-Mobile USA Inc.
172.58.59.216	T-Mobile USA Inc.
172.58.59.241	T-Mobile USA Inc.
172.58.60.152	T-Mobile USA Inc.
172.58.62.226	T-Mobile USA Inc.
172.58.106.109	T-Mobile USA Inc.
172.58.106.111	T-Mobile USA Inc.
172.58.106.169	T-Mobile USA Inc.
172.58.110.31	T-Mobile USA Inc.
172.58.106.168	T-Mobile USA Inc.
172.58.106.188	T-Mobile USA Inc.
73.26.187.185	Comcast Cable Communications LLC
98.230.216.235	Comcast Cable Communications LLC
98.249.110.124	Comcast Cable Communications LLC

8. The subpoenaed entities may have data retention policies that limit the time period during which this information may be available before it is permanently deleted.

9. Attached hereto as Exhibit C are copies of the substantive components of the subpoenas to T-Mobile USA Inc., Comcast Cable Communications LLC, and Kean University.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Seattle, Washington this 20th day of December, 2019.

/s/ Holly M. Simpkins
Holly M. Simpkins